

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GEORGE IVERSON, Individually,	.	
	.	
Plaintiff,	.	
	.	
v.	.	CIVIL ACTION NO.
	.	1:04-CV-11835-JLT-MBB
	.	
MANFELD HOTEL ENTERPRISES	.	
LIMITED PARTNERSHIP, a	.	
Massachusetts Limited Partnership,	.	
	.	
Defendant.	.	
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**MOTION OF THE PLAINTIFF TO PERMIT COUNSEL
TO APPEAR PRO HAC VICE**

In accordance with 83.5.3(b) of the Local Rules of the United States District Court District of Massachusetts that governs the admission and practice of attorneys in said District Court, the undersigned respectfully moves for the admission of Tracie L. Dickerson, Esquire, 12000 Biscayne Blvd., Suite 609, North Miami, Florida 33181, (305) 891-5199, for purposes of appearing as counsel on behalf of Plaintiff, George Iverson, in the above-styled case.

Tracie L. Dickerson certified herewith that she has studied the Local Rules of this Court and is a member in good standing of the Florida Bar; and is admitted to the United States District Court for the Southern and Middle Districts of Florida, as well as the Southern and Northern Districts of Texas. Ms. Dickerson's Florida Bar Number is 719668. There are no disciplinary proceedings against Ms. Dickerson in any jurisdiction. Certificates of good standing from the Florida Bar and the U.S. District Court for the Southern District of Florida are attached hereto as Exhibit A. Ms. Dickerson is an associate with the law firm of Fuller, Fuller & Associates, P.A. and has

been a member of the Florida Bar for one (1) year. An Affidavit of Tracie L. Dickerson in Support of this Motion to Admit Counsel Pro Hac Vice is attached hereto as Exhibit B.

In further support of this motion, it is hereby designated that O. Oliver Wragg is a member of the Bar of this Court. He is also a person to whom the Court and Counsel may readily communicate and upon whom papers may be served.

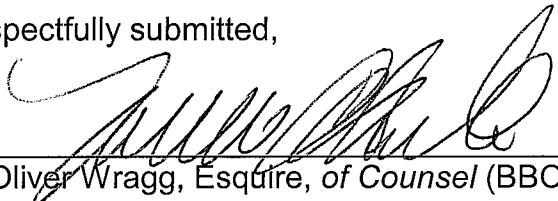
Ms. Dickerson is familiar with the Local Rules of the United States District Court for the District of Massachusetts and her application for leave to practice in this court is on motion of a member of the bar of this court, who has already appeared as counsel for the Plaintiff, George Iverson. Additionally, Ms. Dickerson has also submitted the required \$50.00 filing fee to the Clerk of the U.S. District Court.

WHEREFORE, the plaintiffs request that this Court grant Tracie L. Dickerson permission to appear before this Court pro hac vice.

CERTIFICATE OF CONFERENCE

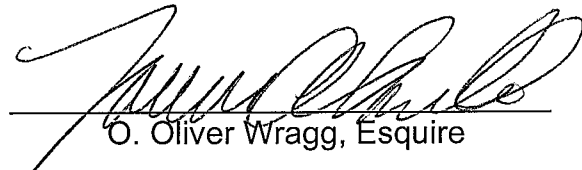
The undersigned hereby certifies that counsel for defendant has assented to the foregoing motion.

Respectfully submitted,


for O. Oliver Wragg, Esquire, of Counsel (BBO# 643152)
FULLER, FULLER AND ASSOCIATES, P.A.
12000 Biscayne Blvd., Suite 609
North Miami, Florida 33181
Tel.: (305) 891-5199
Fax: (305) 893-9505

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished via U.S. Mail on this 9 day of March, 2005 to: Jaclyn L. Kugell, Esq. and Laurence J. Donoghue, Esq., Morgan, Brown & Joy, LLP, 200 State Street, 11th Floor, Boston, MA 02109-2605.


O. Oliver Wragg, Esquire